



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JN/AS  
F. #2017R01809

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 14, 2018

By ECF

The Honorable Raymond J. Dearie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Zaslavskiy  
Criminal Docket No. 17-647 (RJD)

Dear Judge Dearie:

The government writes this letter to respectfully request permission to file an oversized memoranda of law in opposition to the defendant's motion to dismiss the indictment in the above-referenced case. The government's opposition is due on Monday, March 19, 2017. The Court's rules limit memoranda to 25 pages unless a party receives leave to exceed the limit. The defendant consents to this request.

The government anticipates filing a brief in excess of 25 pages and respectfully requests that the Court allow a maximum of 40 pages, though the government will endeavor to stay well within this limit as it finalizes its submission. The defendant raises a number of arguments in his brief regarding the dismissal of the indictment. The government does not have the benefit of a reply and intends to provide the Court with a complete picture of the facts that are directly relevant to both, the facial attack on the indictment and to constitutional vagueness. Of course, we are cognizant of the need to keep the brief concise and will keep our response as short as possible.

Thank you for your consideration.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Julia Nestor  
Julia Nestor  
Assistant U.S. Attorney  
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Cc: Clerk of the Court (RJD) (By ECF and email)  
Mildred Whalen, Esq. (By ECF and E-mail)  
Len Kamdang, Esq. (By ECF and E-mail)